

# 2018—1st Quarter Newsletter

## Electronic Filing of OSHA 300A Log Data

The end of 2017 was met with the implementation of an OSHA final rule requiring employers in certain industries to electronically submit injury and illness data to OSHA. The information will come from your OSHA 300A records that you are already required to keep under existing OSHA regulations.

December 31<sup>st</sup> was the deadline to submit your 2016 data, and 2017 figures will be required to be submitted no later than

July 1<sup>st</sup>, 2018. Beginning in 2019, March 2<sup>nd</sup> will be the submittal deadline, so we are encouraging everyone to start with that deadline next year, rather than waiting until July.

Because OSHA's recordkeeping standard 29 CFR 1904.32 already requires that the 300A Summary of Work-Related Illnesses and Injuries be posted between Feb. 1<sup>st</sup> and April 30<sup>th</sup> each year, you should have the required submittal data prepared in time for the March deadline. As long as you take the time **now** to establish your online submittal account, you should be right on track for getting your submittal completed in a timely fashion.

The Injury Tracking Application (ITA) is what OSHA has set up for this process. A link to the ITA system and step-by-step PDF instructions can be [found here](#). Take a look to be sure that you have everything set up and ready to go. And keep in mind that even if you are not currently categorized as being required to submit your 300A data, if OSHA notifies you to do so for an individual data collection, you **will** be required to comply. So familiarizing yourself with the process early is not a bad idea.



\*That are currently required to keep OSHA injury and illness records

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## New and Revised Fact Sheets on Silica Now Available



OSHA has released [more than a dozen fact sheets](#) that provide guidance on the respirable crystalline silica standard for construction. One fact sheet is an overview of the silica standard. The other fact sheets provide employers with information on how to fully and properly implement controls, work practices, and if needed, respiratory protection for each of the 18 tasks listed in Table 1 — Specified Exposure Control Methods under the standard.

## OSHA FAQ:

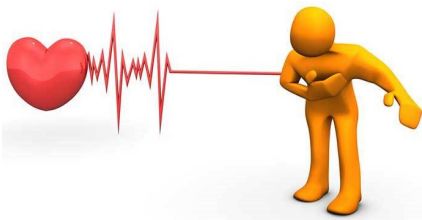
### ***Do I have to report a work-related fatality or in-patient hospitalization caused by a heart attack?***

Yes, all work-related fatalities or inpatient hospitalizations caused by a heart attack must be reported to OSHA.

Your local OSHA Area Office director will decide whether or not to investigate the event, depending on the circumstances of the heart attack.

Heart attacks of workers where there is no indication that the work environment either caused, contributed to, or significantly aggravated a pre-existing condition (e.g., sedentary workers who were not engaged in strenuous activities) may not be considered work related.

To determine whether the heart attack is work-related, the employee's work duties and work environment must be evaluated to decide whether or not the work environment caused, contributed to, or significantly aggravated a pre-existing condition.



## Why Companies Should Train Workers to Respond to Emergencies

In case of emergency, would your employees know what to do?

I'm specifically referring to medical emergencies, and I have reason for posing the question. I recently had an experience where my training in emergency medical response proved valuable, to say the least.

While waiting to board a flight for Houston with my colleague, a Chief Medical Officer, an announcement was broadcast that a doctor was needed. We assumed that someone was sick and headed to the area identified in the announcement. On the ground was a man who had no pulse — he'd suffered a heart attack. My colleague took over cardiopulmonary resuscitation (CPR) after a well-intentioned, but probably untrained person had started the procedure. I asked for the automated external defibrillator (AED). Using the AED, we brought the man back to life and kept him alive until the paramedics arrived.

During the entire episode, I was very aware of one thing: panic. Not mine, but the panic around me. Lots of people were completely unsure about what to do. A flight attendant had to be taken off a plane. Vital minutes simply were lost because no one had the training to respond properly to the emergency.

Medical emergencies happen more often than people are aware. My experience at the airport solidified for me just how important it is that everyone, including every one of my workers, has the training and skills they need to help during an emergency. Training your employees isn't just for the benefit of your company; it's for the benefit of anyone who needs help anywhere your colleagues frequent.

A 2014 report released by the American Heart Association states about 326,200 people experienced out-of-hospital cardiac arrests (OHCA) in the U.S. in 2011. Only 10.6% of those that utilized emergency medical services survived. Lastly, only 31.4% of individuals who had a heart rhythm that could be treated with a defibrillator (ventricular fibrillation-VF or ventricular tachycardia-VT) survived of the of the recorded 19,300 bystander-witnessed cases.

Clearly, good training goes a long way when it comes to saving lives.

Implementing a solid training program is pretty simple. Both the American Red Cross and the American Heart Association offer courses. I can't emphasize enough the need for hands-on training. YouTube videos are fine if you want to refresh your memory about how to change the oil in your car, but hands-on training with a mannequin and the close supervision of a trained instructor is the way to go for CPR/AED and first aid.

How to get your employees behind this? Make it mandatory and make it on company time. Also, take the time to explain why the initiative is important. Work with managers to be sure the timing of the training is convenient for each team, and then find out what would add some fun to the training time. Providing lunch or snacks always is a good start.

However you make it happen, remember — making sure your employees properly are trained in CPR/AED and first aid could be the difference between life and death.

***\*\* National Safety Consulting can provide Medical Emergency Training \*\****

# GENERAL INDUSTRY — 29 CFR 1910

## Silica and General Industry Organizations

The Construction industry spent most of 2017 learning about respirable crystalline silica and how to comply with the final rule and it's moving enforcement date.

That date has come and gone, and now companies who fall under the General Industry standards will spend early 2018 learning from the way it all went down for the Construction sector.

The 1910 compliance deadline for the Silica standard is June 23, 2018 with the following exceptions:

1. Medical surveillance must be offered to employees who will be exposed at or above the Action Level for 30 or more days a year starting on June 23, 2020. *(Medical surveillance must be offered to employees who will be exposed above the Permissible Exposure Limit (PEL) for 30 or more days a year starting on June 23<sup>rd</sup>, 2018.)*
2. Hydraulic fracturing operations in the oil and gas industry must implement engineering controls to limit exposures to the new PEL by June 23<sup>rd</sup>, 2021.

While the deadline isn't until June, start getting things into place now in order to be compliant.

You can learn more about OSHA's proposed rule, including opportunities to participate in development of the rule, by visiting OSHA's Silica Rulemaking webpage at [www.osha.gov/silica](http://www.osha.gov/silica).

### What does the standard require employers to do?

- Measure the amount of silica that workers are exposed to if it may be at or above an action level of 25 µg/m<sup>3</sup> (micrograms of silica per cubic meter of air), averaged over an 8-hour day
- Protect workers from respirable crystalline silica exposures above the permissible exposure limit of 50 µg/m<sup>3</sup>, averaged over an 8-hour day
- Limit workers' access to areas where they could be exposed above the PEL
- Use dust controls to protect workers from silica exposures above the PEL
- Provide respirators to workers when dust controls cannot limit exposures to the PEL
- Restrict housekeeping practices that expose workers to silica where feasible alternatives are available
- Establish and implement a written exposure control plan that identifies tasks that involve exposure and methods used to protect workers
- Offer medical exams — including chest X-rays and lung function tests — every three years for workers exposed at or above the action level for 30 or more days per year
- Train workers on work operations that result in silica exposure and ways to limit exposure
- Keep records of workers' silica exposure and medical exams.

Number of Workers Exposed to Respirable Crystalline Silica in Selected General Industry/ Maritime Sectors		
Industry sector	Workers currently exposed	Workers currently exposed above the new PEL
Asphalt Roofing Materials	3,158	1,410
Concrete Products	32,981	9,391
Cut Stone	9,429	5,243
Dental Laboratories	31,105	864
Foundries	34,591	12,173
Jewelry	6,772	2,434
Porcelain Enameling	4,113	1,654
Pottery	6,269	2,496
Railroads	16,895	5,340
Ready-Mix Concrete	27,123	19,941
Shipyards	3,038	2,228
Structural Clay Products	7,893	3,198
Support Activities for Oil and Gas Operations	16,960	11,207

Source: OSHA Directorate of Standards and Guidance

## NFPA 2018 Changes

The purpose of NFPA 70E, Standard for Electrical Safety in the Workplace is to provide a working area for employees that is safe from unacceptable risk associated with the use of electricity in the workplace. NFPA 70E establishes safety processes that use policies, procedures, and program controls to reduce the risk associated with the use of electricity to an acceptable level.

Electrical equipment and electrical safety devices are constantly being changed and improved, hence why your electrical safety program must address those changes. The NFPA 70E Committee addresses these changes and updates the standard every three years as part of keeping up with current technology and safety concerns. This is a standard not only used by facility managers and safety officers, but also by OSHA inspectors, continually educating them on existing trends in electrical safety. You can get free online access to the 2018 standards [here](#), at [NFPA.org](http://NFPA.org)

### What are some of the major changes for 2018?

- Risk Assessment Procedure — The risk assessment procedure now specifically requires you to address human error and its negative consequences on people, processes, work environments, and equipment. To assist in implementation, new Informative Annex Q has also been added.
- Hierarchy of Risk Control Methods — Formerly part of an informational note, the hierarchy of risk control methods has moved into the standard's mandatory text. The standard now explicitly states that the first priority must be the elimination of the hazard; each method that follows it is considered less effective than the one before it.
- Establishing an Electrically Safe Work Condition (ESWC) — Although there are no major changes to these requirements, the sections within Article 120 have been completely restructured to logically walk you through how to set up a program.
- Estimate of the Likelihood of Occurrence of an Arc Flash Incident — This table has been revised and has also moved [now Table 130.5(C)]. This table can be used for both ways of doing your arc flash risk assessment — it now also applies to the incident energy analysis method, instead of just the PPE category method.
- Selection of Arc-Rated Clothing using Incident Energy Analysis Method — Formerly part of the Annex material, this table [now Table 130.5(G)] has moved into the standard's mandatory text. It has also been revised to provide guidance on how to select gear when using the incident energy analysis method.

## More Changes for 2018...

### JANUARY

#### *Labor Law Poster Updates*

Minimum Wage Posters must be updated to reflect new 2018 minimum wage rate of \$7.85 effective January 1<sup>st</sup>, 2018

### JULY

#### *OSHA 300A Logs submitted*

Deadline for submitting 2017 OSHA 300A Log information electronically is July 1<sup>st</sup>, 2018.

### SEPTEMBER

#### *Modify Beryllium Standards?*

OSHA's fall 2017 regulatory agenda projects that the agency will finalize a rule modifying standards for occupational exposure to beryllium and beryllium compounds by September 2018.

### OCTOBER

#### *Underground Storage Tank Training*

October 13<sup>th</sup>, 2018 is the final deadline for complying with the remaining requirements of the federal 2015 underground storage tank (UST) [amendments](#).

### NOVEMBER

#### *Caged ladder fall protection*

OSHA's new standard 1910.28 taking effect November 19<sup>th</sup>, 2018, ladders will not be required to have fall protection until their height is over 24'. OSHA will also be requiring ladders installed after November 18<sup>th</sup>, 2018 to have fall protection in the form of a personal fall arrest system or ladder safety system (not a cage). If you have cages now, don't worry, you will be grandfathered in for twenty years.

## Links found in this issue

### ITA Website link & PDF Instructions (Page 1)

<https://www.osha.gov/injuryreporting/index.html>

### Silica Fact Sheets (Page 1)

<https://www.osha.gov/pls/publications/publication.searchresults?pSearch=Controlling+Silica+Dust+in+Construction+&pSearch=>

### NFPA 70E 2018 Online Access (Page 4)

<http://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=70E>

### 2015 Underground Storage Tank Amendments (Page 4)

<https://www.gpo.gov/fdsys/pkg/FR-2015-07-15/pdf/2015-15914.pdf>